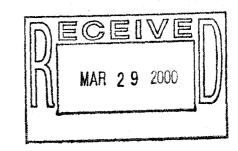


6111 Broken Sound Parkway NW Boca Raton, FL 33487-3693 (561) 241,9400 '00 APR -6Fak (364) 995-5188

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March 15, 2000

Food and Drug Administration Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition 200 C Street, SW Washington, DC 20204



Dear Sirs:

Notice is hereby given pursuant to Section 403(r)(6) (21 U.S.C. § 343(r)(6)) of the Federal Food, Drug, and Cosmetic Act that Rexall Sundown, Inc. ("Sundown") located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Sundown, Rexall and Thompson brand names bearing the following statement(s) on the label and/or in the labeling:

Echinacea, Echinacea XTRA, Echinacea Purpurea (Sundown): [For] healthy immune function. Echinacea, or Purple Coneflower, is native to North America and has a long history of traditional use. Echinacea helps support healthy immune function and promotes general well-being. Echinacea is one of the most widely used immune boosters in the herbal kingdom. It naturally stimulates immune system function, helping to activate the body's protective processes. It's the natural way to maintain health, especially during the winter months. Echinacea boosts the body's protective processes by enhancing the function of white blood cells that defend our body. Sundown's Echinacea XTRA adds goldenseal, astragalus, reishi and shiitake to offer superior natural immune function support.

Echinacea 500mg (Rexall): [For] healthy immune function. Echinacea, or Purple Coneflower is native to North America and has a long history of traditional use. Echinacea helps support healthy immune function and promote general well-being during the winter months.

Echinacea (Thompson): [It is] for healthy immune function. Echinacea supports the body's natural defenses and promotes general well-being especially during the cold, winter months.

The undersigned certifies that the information contained in this notice is complete and accurate and that Sundown has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

Demuk Sher Dont

Deborah Shur Trinker Vice President of Regulatory Affairs and Assistant General Counsel

Enclosure

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